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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

PATRICIA WILANN PENNINGTON,

Plaintiff,

vs.

KILILO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-00870-BNW

**UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE CERTIFIED  
ADMINISTRATIVE RECORD AND ANSWER**

***(FIRST REQUEST)***

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the "Commissioner"), by  
 2 and through her undersigned attorneys, hereby moves for a 45-day extension of time to file the Certified  
 3 Administrative Record (CAR) and answer to Plaintiff's Complaint. The CAR and answer to Plaintiff's  
 4 Complaint are due to be filed by September 5, 2022. This is the Commissioner's first request for an  
 5 extension of time.

6 Defendant submits that good cause exists for this extension request, as the Defendant requires  
 7 additional time to explore settlement options in this case. Accordingly, Defendant requests an extension  
 8 in which to respond to the Complaint until October 20, 2022. If Defendant is unable to produce the  
 9 certified administrative record necessary to file an Answer in accordance with this Order, Defendant shall  
 10 request an additional extension prior to the due date.

11 On August 30, 2022, the undersigned conferred with Plaintiff's counsel, who has no opposition to  
 12 the requested extension.

13 It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR  
 14 and answer to Plaintiff's Complaint, through and including October 20, 2022.

15 Dated: September 2, 2022

16 JASON M. FRIERSON  
 17 United States Attorney

18 /s/ Timothy R. Bolin  
 19 TIMOTHY R. BOLIN  
 20 Special Assistant United States Attorney

21 IT IS SO ORDERED:

22   
 23 UNITED STATES MAGISTRATE JUDGE

24 DATED: September 6, 2022  
 25  
 26

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Marc V. Kalagian  
Marc.Kalagian@rksslaw.com  
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 2, 2022

/s/ Timothy R. Bolin  
TIMOTHY R. BOLIN  
Special Assistant United States Attorney